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September 27, 2023

The Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street, Room 621
White Plains, NY 10601-4150

Via ECF

Re: *Roth v. National Recovery Agency, Inc.* Case No.: 7:23-cv-1127 -KMK
Request for Adjournment of Case Management Conference

Dear Judge Karas:

On September 1, 2023, this Court granted an extension of the deadline for fact discovery until November 29, 2023. *See* Text Order dated September 1, 2023. In light of that extension, at the Status Conference held on September 12, 2023, Magistrate Judge Victoria Reznik ordered the parties to submit a joint letter to the Court requesting an adjournment of the Case Management Conference currently scheduled for October 30, 2023. *See* Text Order dated September 12, 2023. In accordance with that Order, the parties respectfully request that the Case Management Conference be adjourned to December 29, 2023. The original fact discovery deadline was September 30, 2023.

Although not addressed at the September 12, 2023 Status Conference with Magistrate Judge Victoria Reznik, the parties respectfully request that the deadlines for motion practice be extended as well. The parties request that the Court adjourn the deadline for moving parties to submit a pre-motion letter, currently set for October 16, 2023, to January 15, 2024, and the non-moving party's deadline to respond, currently set for October 23, 2023, to January 22, 2024.

We thank the Court for its kind consideration and courtesies in this matter.

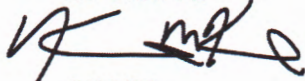
Respectfully submitted,

/s/ Ken Willard

Kenneth Willard

The case management conference is adjourned to 1/ 25/24, at 10:30. The pre-motion letter deadlines are moved accordingly.

So Ordered.



9/28/23

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